

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER

ED NUNLEY, KRISTI LAY HURST
and HOLLI LAY BRANSON

Plaintiff

vs.

PROPERTY & CASUALTY
INSURANCE COMPANY OF
HARTFORD

Defendants.

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NO. _____

JUDGE _____

NOTICE OF REMOVAL

1. The above-named plaintiff on the 1st day of March, 2011, filed Complaint in the Circuit Court of Franklin County, Tennessee, against the above-named defendant bearing Docket No. 18197-CV.

2. A copy of the Summons and Complaint, which were served upon the defendant through the Tennessee Department of Commerce and Insurance, on March 14, 2011, is attached hereto and filed herewith. These are all of the process, pleadings and orders which have been served upon the defendant.

3. Plaintiffs were at the time of the commencement of said action and still are citizens and residents of the State of Tennessee and of no other state.

4. Defendant was at the time of the commencement of said action and still is a corporation organized under the laws of the State of Indiana and of no other state, with its principal place of business at One Hartford Plaza, Hartford, CT 06155.

5. The amount in controversy in said action exceeds the sum or value of Seventy-Five Thousand (\$75,000.00) Dollars, exclusive of interest and costs, and is wholly between the citizens of different states and is within the jurisdiction of this Court, pursuant to the provisions of Title 28 United States Code, section 1332 and is removable to this Court pursuant to the provisions of Title 28 United States Code, section 1441.

WHEREFORE, defendant prays this Court accept this Notice and to proceed with the action heretofore referred to in accordance with law.

LEITNER, WILLIAMS, DOOLEY & NAPOLITAN,
PLLC

BY: 

Thomas A. Williams – TNBPR #: 001688

Benjamin T. Reese – TNBPR #: 23847

Attorneys for Defendant

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Chattanooga, Tennessee 37402

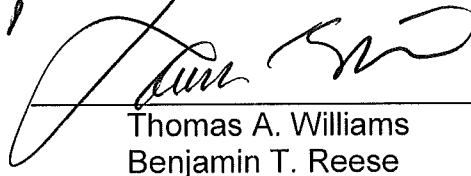
Telephone: (423) 265-0214

Telecopier: (423) 266-5490

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing document upon Gregory M. O'Neal, Esquire, 2 South Jefferson Street, P.O. Box 555, Winchester, TN 37398, by mailing him a copy of the same through the United States mail in a properly addressed envelope with sufficient postage affixed to reach its destination.

This 8th day of April, 2011.



Thomas A. Williams
Benjamin T. Reese